

Fairfax County Democratic Committee  
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Committee ID Number C00277541

April 26, 2007

Mr. Daniel Buckley  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington DC 20463

(by electronic transmission)

Dear Mr. Buckley,

This is in reply to three letters you wrote to me on March 28, 2007, seeking clarification of three FEC reports filed by the Fairfax County Democratic Committee. Your three letters address the reporting periods for the July Quarterly Report (4/1/2006 to 6/30/2006), the October Quarterly Report (7/1/2006 to 9/30/2006) and the 30-Day Post General Report (10/1/2006 to 11/27/2006).

The Committee made no expenditures supporting specific candidates for public office, such as expenses to be disclosed on lines 23, 24, or 25, or on Schedules B, E, or F in any of the reporting periods in question. Expenditures for which you sought clarification have been modified in amended filings of this date. A number of expenses are exempt party activity, which were erroneously reported on Schedule B line 21(b) instead of their proper inclusion on Schedule B line 30(b). All three reports have been amended to report these Federal Election Activity expenses on line 30(b) with memo text explanations of why they are exempt party activities, not subject to being reported as campaign contributions, coordinated party expenses or in kind campaign contributions to the candidates.

Our fundraising expenditures raised many questions in your letters. On the advice of counsel, we do not mention any Federal candidates by name, nor do our fund raising appeals engage any express advocacy, so they do not meet the definition of Federal Election Activity. Expenses of generic fund raising for our Committee are reported on Schedule B line 21, and not on Schedule B line 30(b).

Campaign activities of the Committee which name Federal candidates are disclosed on Schedule B line 30(b) and they are exempt, in that production of the mail pieces advocating specific candidates is staffed entirely with volunteers. Therefore, there is no in kind contribution, no independent expenditure, and no coordinated party expenditure, to report for any candidate. There is no expense to report on Schedule B, E, or F supporting lines 23, 24, or 25, as appropriate.

Your letters question reimbursements to individuals for a number of committee expenses and request the names, addresses, transaction dates and details of the source vendors for disbursements over \$200. This is the first time we have been asked details of this nature, and our accounting system is able to provide this information. Memo text modifications have been made for all questioned reimbursements to committee members, providing dates, amounts, source vendor names and addresses. This information will be included in future reports of the Committee. Reports of the three time periods addressed in your letters have been amended to clarify the source vendor information on reimbursements aggregating to vendors over \$200.

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I hope you find the amended reports to meet the requirements of full disclosure.

Sincerely,

Bruce Neilson, Treasurer  
Fairfax County Democratic Committee  
[by electronic signature]

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